

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES

V.

TAREK MEHANNA

Defendant.

Crim. No. 08-MJ-0148-LTS

GOVERNMENT’S MOTION FOR A PROTECTIVE ORDER
(ASSENTED TO)

The United States, by and through Michael J. Sullivan, United States Attorney, and Alope S. Chakravarty and Jeffrey Auerhahn, Assistant U.S. Attorneys, for the District of Massachusetts, respectfully submits this Assented to Motion For A Protective Order, and states as follows:

The United States has provided limited discovery in this case, and intends on providing additional discovery in the future. The discovery contains law enforcement sensitive information, information from which the identity of cooperating witnesses may be gleaned, and other sensitive information related to this ongoing investigation. In the face of a request for discovery, the government has agreed to provide information to the defendant and his attorney (“the discovery materials”), provided there are reasonable restrictions to ensure that the information is not further disseminated, and that there is documentation as to who has had access to the information. As grounds for its motion, the Government states that the parties have agreed that a Protective Order which will be filed with the court at the next hearing, satisfies the concerns of the parties at this stage.

Counsel for the Defendant has assented to this motion. The Government is providing the discovery materials to the defendant pursuant to the mutual understanding of the protections of

the proposed protective order, a copy of which has been provided to the counsel for the defendant and will be filed with the court at the next hearing.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Alope Chakravarty
ALOE S. CHAKRAVARTY and
JEFFREY AUERHAHN
Assistant United States Attorneys

Dated: November 14, 2008